

STATE OF NEW MEXICO  
WATER QUALITY CONTROL COMMISSION

WQCC 15-05 (CO)



**IN THE MATTER OF Enterprise Products Operating LLC  
A Texas limited liability company.**

THE OIL CONSERVATION DIVISION'S AGREED MOTION FOR EXTENSION OF TIME

COMES NOW Petitioner, the Oil Conservation Division ("OCD"), and, pursuant to 20.1.3.12 NMAC, hereby requests an order granting the OCD a seven (7) day extension to respond to Enterprise Products Operating LLC's Opposed Motion to Conduct Additional Discovery (the "Motion").

Enterprise filed its Motion on August 7, 2015. OCD's response, pursuant to 20.1.3.15 NMAC, is due August 24, 2015. Counsel for the OCD has attended medical appointments this week and has had inconsistent office hours due to said appointments. Furthermore, counsel will be out of the country August 15 through August 21, 2015 on a pre-planned vacation.

A one week extension of time to respond to the Motion will not prejudice either party and is justified given the circumstances. Therefore, OCD respectfully requests if be allowed to file its response to the Motion on August 31, 2015, and, accordingly, Enterprise be granted a seven (7) day extension to reply to OCD's response.

Respectfully submitted this 14<sup>th</sup> day of August, 2015.

OIL CONSERVATION DIVISION

By:   
Allison R. Marks, Assistant General Counsel  
Energy, Minerals and Natural Resources/Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505  
Tel. 505.476.3206

Certificate of Service

I hereby certify that a true and correct copy of the Oil Conservation Division's Agreed Motion for Extension of Time was sent via electronic mail and first class mail (hand delivered to Ms. Castaneda) on this 14<sup>th</sup> day of August, 2015 to:

William Scott  
Sarah Stevenson  
Modrall, Sperling, Roehl, Harris & Sisk, P.A.  
500 4<sup>th</sup> St. NW, Ste. 1000  
Albuquerque, New Mexico 87103-2168  
[bscott@modrall.com](mailto:bscott@modrall.com)  
[sarah.stevenson@modrall.com](mailto:sarah.stevenson@modrall.com)

Pam Castaneda  
Administrator  
New Mexico Water Quality Control Commission  
1190 S. St. Francis Drive, S-2102  
Santa Fe, New Mexico 87502  
[Pam.Castañeda@state.nm.us](mailto:Pam.Castañeda@state.nm.us)

By: /s/ Allison R. Marks  
Allison R. Marks, Assistant General Counsel  
Energy, Minerals and Natural Resources Department  
Oil Conservation Division